25

26

27

28

1	MARK E. FERRARIO	
_	Nevada Bar No. 1625	
2	CHRISTOPHER R. MILTENBERGER	
3	Nevada Bar No. 10153	
3	GREENBERG TRAURIG, LLP 3773 Howard Hughes Parkway, Suite 400 No	rth
4	• • • • • • • • • • • • • • • • • •	
•	Telephone: (702) 792-3773	
5	Facsimile: (702) 792-9002	
	Email: ferrariom@gtlaw.com; miltenbergerc@gtlaw.com	
6		
7	GREGORY J. CASAS (pro hac vice pending)	
	Texas Bar No. 455329	
8	GREENBERG TRAURIG, LLP	
	300 West 6th Street, Suite 2050	
9	Austin, Texas 78701	
	Telephone: (512) 320.7238	
0	Facsimile: (512) 320.7210	
	Email: casasg@gtlaw.com	
1		
	Counsel for Defendants Switch, Ltd., et al.	
2	V	
3	UNITED STATES DISTRICT C	
3	DICTRIC	
4	DISTRICT OF NEVADA	
'	V5 TECHNOLOGIES, LLC, d/b/a	Case No. 2:17-CV-0
5	COBALT DATA CENTERS	Case 110. 2.17-C V-0
	COBRET BITTI CENTERS	
6	Plaintiff,	
_		STIPULATION A
7	v.	ORDER TO EXTE

2:17-CV-02349-KJD-NJK

ATION AND [PROPOSED] TO EXTEND DEADLINE TO **SUBMIT PROPOSED ESI STIPULATION**

Defendants.

SWITCH, LTD., a Nevada limited

SOLUTIONS, LLC, a Nevada limited

COMMUNICATIONS GROUP, LLC, a Nevada limited liability company;

SWITCH, INC., a Nevada corporation,

company; SWITCH BUSINESS

liability company; SWITCH

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendants Switch, Ltd., Switch Business Solutions, LLC, Switch Communications Group, LLC, and Switch, Inc. (collectively, "Defendants") and Plaintiff V5 Technologies, LLC d/b/a Cobalt Data Centers ("Plaintiff") agree and stipulate to extend the deadline for the parties to submit their proposed ESI Stipulation until

Page 1 of 2

LV 421033648v1

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Friday, December 22, 2017, and request that the Court enter an order approving the same.

On December 6, 2017, the Court entered a Scheduling Order (ECF No. 40) directing the parties to submit a proposed ESI Stipulation governing the production of electronically stored information on or before December 19, 2017. The parties are continuing to negotiate the terms of a proposed ESI Stipulation and desire additional time to conclude their negotiations in hopes of avoiding the need for court intervention on this issue. The parties believe that they will be able to conclude these negotiations by December 22, 2017. As a result, the parties respectfully request that the Court enter an order extending the deadline for them to submit a proposed ESI Stipulation to December 22, 2017.

Dated: December 19, 2017 Dated: December 19, 2017

By: <u>/s/ Catherine</u> Simonsen

I. Scott Bogatz Kerry E. Kleiman **REID RUBINSTEIN & BOGATZ** Bank of America Plaza 300 South 4th Street, Suite 830 Las Vegas, NV 89101

Bryan A. Merryman (pro hace vice) Catherine Simonsen (*pro hace vice*) WHITE & CASE LLP 555 S. Flower Street, Suite 2700 Los Angeles, CA 90071-2433

Claire DeLelle (pro hace vice) WHITE & CASE LLP 701 Thirteenth Street, NW Washington, DC 20005-3807

Attorneys for Plaintiff

By: /s/ Christopher R. Miltenberger

Samuel Castor Anne-Marie Birk SWITCH, LTD. 7135 S. Decatur Blvd. Las Vegas, Nevada 89118

Mark E. Ferrario Christopher R. Miltenberger GREENBERG TRAURIG, LLP 3773 Howard Hughes Parkway Suite 400 North Las Vegas, NV 89169

Gregory J. Casas (pro hac vice pending) GREENBERG TRAURIG, LLP 300 West 6th Street, Suite 2050 Austin, Texas 78701

Attorneys for Defendants

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: December 20, 2017